



**U.S. Department of Justice**

United States Attorney  
Eastern District of Missouri

*Criminal Division*  
*Violent Crime Unit*

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September 25, 2015

**VIA ELECTRONIC MAIL AND  
ELECTRONIC SERVICE**

William Lucco  
Christopher Threlkeld  
Lucco, Brown, Threlkeld & Dawson LLP  
224 Saint Louis Street  
Post Office Box 539  
Edwardsville, Illinois 62025

In re: United States v. Anthony Jordan  
Cause No. 4:15 CR 404 HEA (NAB)

Messrs. Lucco and Threlkeld:

Enclosed please find discovery in the above-referenced matter. In order to assist you in the determination of any relevant pretrial motions to be filed in this case, please be aware of the following information:

1. DISCOVERY - The United States agrees to provide you with all relevant material within the purview of Federal Rule of Criminal Procedure 16.
2. ELECTRONIC SURVEILLANCE - The United States did not utilize electronic surveillance in the investigation underlying the charges set forth in the indictment.
3. CONFIDENTIAL INFORMANTS - The United States did not utilize a confidential informant in the course of the investigation of this matter.
4. JENCKS MATERIAL - The United States agrees to make all Jencks material available no later than the Friday preceding trial, conditioned upon the defendant's agreement to produce simultaneously statements of the defendant's witnesses.
5. GRAND JURY TRANSCRIPTS - The United States agrees to produce, and make available for inspection, all Grand Jury transcripts to the extent they constitute Jencks material.

6. OTHER CRIMES EVIDENCE - The United States agrees to advise the defendant of its intention to use evidence of other crimes during its case-in-chief. The United States agrees to make this disclosure prior to the trial of this cause.

7. STATEMENTS OF DEFENDANT - The United States is aware of post-arrest statements made by the defendant.

8. IDENTIFICATION OF DEFENDANT - The United States is unaware of any post-arrest identification of the defendant.

9. PHYSICAL EVIDENCE - The United States possesses items of physical evidence seized from the defendant. These items are available for inspection upon request.

10. FAVORABLE EVIDENCE - The United States agrees to furnish any and all favorable evidence to the defendant if and when its existence becomes known to the United States. At the present time, the United States does not have any favorable evidence.

11. EXPERT WITNESSES - Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the United States intends to introduce expert testimony of the following witnesses: firearms examiner, DNA analyst, latent fingerprint examiner, and a drug distribution expert among others. A summary of expert testimony will be provided before trial.

The following information is contained within this preliminary disclosure:

Reports: December 29, 2013, homicide

Report: Office of the Medical Examiner regarding Walker

Report: Office of the Medical Examiner regarding Parker

Photographs: December 29, 2013, homicide scene

Reports: January 21, 2014, homicide

Report: Office of the Medical Examiner regarding Gridiron

Photographs: January 21, 2014, homicide scene

Search Warrant: 4223 Sacramento

Search Warrant: 4217 Sacramento

Search Warrant: Audi make, A6 model vehicle

Search Warrant: Black Infiniti make vehicle

Court Order: Cellular Telephone Number 314-783-1267

Search Warrant: 64 Brighton Park Drive

Search Warrant: 2006 white Jeep SRT

Search Warrant: 2005 green Pontiac Grand Prix

Search Warrant: 2004 red Pontiac Coupe

Search Warrant: 2004 black Chevrolet Silverado SS

Photographs: Search warrant executions

Report: 64 Brighton Park Drive search

If you need any further specific information regarding the above matters, or any other matters which will prevent the filing and litigation of any unnecessary pretrial motions, please do not hesitate to contact me.

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In order to avoid the need of filing motions pursuant to Rules 12.1(a), 16 and 26, of Federal Rules of Criminal Procedure, the United States makes the following requests:

A. The defendant provide a written notice of the defendant's intention to offer a defense of alibi, stating the specific place or places at which the defendant claims to have been at the time of the alleged offense and the names and addresses of the witnesses upon whom the defendant intends to rely to establish such alibi;

B. The defendant provide the United States, or permit the United States to inspect and copy or photograph books, papers, documents, photographs, tangible objects, or copies thereof, which are within the possession, custody or control of the defendant and which the defendant intends to introduce as evidence in chief at trial;

C. The defendant provide the United States, or permit the United States to inspect and copy or photograph any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with the particular case, or copies thereof, within the possession or control of the defendant, which the defendant intends to introduce as evidence in chief at the trial or which were prepared by a witness whom the defendant intends to call at the trial when the results or reports relate to his testimony.

D. The defendant provide the United States a written summary of testimony the defendant intends to use under Rules 702, 703 and 705 of the Federal Rules of Evidence as evidence at trial. This summary must describe the opinions of the witnesses, the bases and reasons therefor and the witnesses' qualifications.

E. The defendant provide to the United States all statements of any defense witness that is in their possession and that relates to the subject matter to which the witness will testify.

The United States requests that we receive the information regarding alibi requested in Section A no later than the date of the suppression hearing. The United States would also request that you provide all information regarding Section E no later than noon on the Friday preceding trial to eliminate any delay in the trial of this cause.

I would appreciate a written response prior to any pretrial motion hearing to determine whether I will have to file formal requests for a court order to enforce discovery compliance.

Thank you in advance for your anticipated cooperation.

Very truly yours,

/s/ Thomas Rea

THOMAS REA  
Assistant United States Attorney

cc: Clerk, United States District Court (w/o encls.)